

UST Remediation Wastes

Petroleum contaminated environmental media and debris from an underground storage tank (UST) corrective action are excluded from the definition of hazardous waste if they only exhibit the characteristic of toxicity for TC constituents D018-D043, per 261.4(b)(10). When activated carbon filters are used to remediate these wastes, are the filters also eligible for the exclusion?

The exemption does not apply to spent carbon filters used to remediate petroleum contaminated UST corrective action wastes. The carbon filters are newly generated wastes. Whether disposed of or reclaimed for future reuse, the filters, once spent, would be considered solid wastes (261.1(c)(3)). The filters would, therefore, need to be handled as hazardous waste if they exhibit any characteristic of hazardous waste. (November 1994 Monthly Hotline Report)